

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOE, an individual,

Plaintiff,

v.

**JOSEPH FLETCHER, an individual, by
and through his mother and guardian,
Jacqueline Mary Fletcher,**

Defendant.

No. 2025 CV 05468

Judge Lindsay C. Jenkins

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME
TO FILE A RESPONSE TO DEFENDANT’S FILING**

Plaintiff, Jane Doe, by and through her attorneys, Deborah Rzasnicki Hogan and the Chicago Alliance Against Sexual Exploitation, hereby moves for an extension of time of 14 days, until July 3, 2025, in which to file her response to Defendant’s filing of June 4, 2025.

In support of her motion, Plaintiff states as follows:

1. On May 16, 2025, Plaintiff Jane Doe filed Plaintiff’s Complaint for Civil Relief (“Complaint”) against Defendant alleging violations of 15 U.S.C. § 6851, as well as state court claims for violations of 740 ILCS 190/5, intentional infliction of emotional distress, negligence and invasion of privacy (public disclosure of private facts).
2. On June 4, 2025, Plaintiff received notice from the Court’s electronic notice system that Defendant filed a sealed document with the Court.
3. On June 5, 2025, Plaintiff received notice of the Court’s minute entry that Defendant “has filed a motion to stay due to ‘a clear and ongoing risk of potential criminal exposure.’” The Court ordered Plaintiff to respond to Defendant’s filing by June 19, 2025. Since

Defendant filed his materials under seal, Plaintiff has been unable to access them in the electronic court file.

4. On June 6, 2025, Defendant emailed Plaintiff's counsel providing information about the FedEx tracking information for documents he mailed. In this email, Defendant referred to an initial FedEx package mailed on May 31, 2025 (FedEx # 881676541434). Defendant also referenced a "revised package" which was sent June 5 (FedEx # 881798751644). Also on June 6, 2025, Plaintiff's counsel responded to Defendant and informed him that the documents were not accessible via the electronic court file because they were filed under seal. Plaintiff's counsel requested Defendant send electronic or scanned copies of the documents filed with the court via email.

5. On June 10, 2025, Defendant emailed Plaintiff's counsel and stated that he "believe[d] the FedEx documents from May 31 may be missing in transit." Plaintiff's counsel responded by once again explaining that Defendant's documents were not accessible via the electronic court file and requesting electronic or scanned copies of all documents filed with the court. Defendant responded that his previous email was "simply letting you know the status of the deliveries and the contents of what I've been following. That's all – nothing more, nothing less," and did not provide Plaintiff's counsel with electronic or scanned copies of the documents he filed with the court.

6. As of June 11, 2025, Plaintiff's counsel has not received either of the packets of documents mailed by Defendant, and has been unable to access any of Defendant's filings in the case. As of June 11, 2025, the May 31 packet is listed as "on the way," and the June 5 packet is listed as "out for delivery."

7. Given that Plaintiff's counsel does not yet have a copy of Defendant's filing of June 4, 2025, and it is unclear when the FedEx package will arrive and/or whether Defendant will cooperate and send an electronic copy of the filing via email to Plaintiff's counsel, Plaintiff's counsel will not be able to respond to the motion by June 19. Assuming that Plaintiff's counsel is able to review the motion on or before June 19, Plaintiff's counsel will be able to respond within 14 days, on or before July 3, 2025.

8. Plaintiff's counsel has not conferred with Defendant prior to the filing of this motion because, as of June 11, 2025, there has been no appearance filed by Defendant or opposing counsel on behalf of Defendant. The individually named Defendant, Joseph Fletcher, is currently under the legal guardianship of his mother, Jacqueline Mary Fletcher, as alleged in the Complaint. Therefore, the Defendant in this case is Joseph Fletcher, *by and through his legal guardian*. Although Joseph Fletcher has filed documents in this case, no appearance or other document has been filed in this case by his legal guardian. If no waiver of service of summons signed by Jacqueline Mary Fletcher, as legal guardian, is received by June 18, 2025, Plaintiff will proceed with a request for issuance of summons and attempts at personal service.

9. There have been no previous extensions requested.

WHEREFORE, Plaintiff respectfully requests that this Court extend the filing deadline for Plaintiff's response to Defendant's motion to stay proceedings until July 3, 2025.

Dated: June 11, 2025

Respectfully submitted,

JANE DOE,

By: Deborah Rzasnicki Hogan
One of Her Attorneys

Deborah Rzasnicki Hogan
Allison Munk
Chicago Alliance Against Sexual Exploitation
307 N. Michigan Avenue, Suite 1020
Chicago, IL 60601
(773) 244-2230 ext. 216
dhogan@caase.org